

SMFG India Credit Company Limited

Privacy Policy

Privacy Policy

1. Background

Section 43A of the Information Technology Act, 2000 read with Rule 4 of the Information Technology (Reasonable Security Practices & Procedures & Sensitive Personal Data or Information) Rules 2011¹, requires body-corporate to provide policy for privacy and disclosure of information, if any. The body corporate or any person who on behalf of body corporate collects, receives, possess, stores, deals or handle information of provider of information, should provide privacy policy for handling of or dealing in personal information including sensitive personal data or information and ensure that the same are available for view by such providers of information who has provided such information under lawful contract. Such policy should be published on website of the body corporate.

Company (which term shall include its successors) is strongly committed to protect the Personal information, including but not restricted to Sensitive Personal and Financial Information that customer submits and would endeavour to protect it from unauthorized use.

All natural persons (Covered Person), whose personal information is either collected/ received/ possessed/ stored/ dealt in/ handled by the Company / who visit the site <https://www.smfgindiacredit.com> and provide information to the Company online, are covered under this Policy.

2. Definitions

Personal Information means any information that relates to a Covered Person, which, either directly or indirectly, in combination with other information available or likely to be available with the Company, is capable of identifying such person.

Sensitive Personal and Financial Information means personal information that is otherwise not available to anyone except the customer, such as password, financial information, sexual orientation, medical records, biometric information, physical, physiological and mental health condition. Such information is generally not available in public domain.

3. Collection of Information

In the course of using the website of the Company or availing the products and services vide the online application forms and questionnaires, the Company may become privy to the personal information of its customers, including information that is confidential in nature. Such information may include, but not be limited to: Name, date of birth, demographic details, Aadhaar Number, financial details, family details, banking relationships etc.

¹ [http://meity.gov.in/sites/upload_files/dit/files/GSR313E_10511\(1\).pdf](http://meity.gov.in/sites/upload_files/dit/files/GSR313E_10511(1).pdf)

The Company also collects information in hardcopy through loan applications and supporting documents. The supporting documents are collected as per Know Your Customer (KYC) guidelines issued by Reserve Bank of India and other documents like statement of accounts, financial statements etc. for the underwriting purpose. Some of these documents and the information extracted from the documents are also stored in the electronic form. The Company would also collect information of Covered Person to deliver, promote or market Company's products or services in connection with an existing or potential business or employment relationship.

Cookies: The Company will use small bits of data called "cookies" stored on user's computers to stimulate a continuous connection. "Cookies", enable to store information about customer preferences, IP address, and passwords and allow customer to move to different pages of its secure website without having to re-enter password information. Any information collected is stored in secured databases protected by a variety of access controls and is treated as confidential information by the Company.

4. Use of Personal Information

The Company will use Covered Person's personal information / data in the following circumstances:

- i. To perform the contract, which is about to enter into or have entered into with Covered Person.
- ii. It is necessary for the legitimate interest of the Company and interest and fundamental rights of Covered Person to comply with legal, statutory or regulatory obligations.

The Company may use the personal information collected to improve its services to Covered Person and to keep the Covered Person updated about its new product offerings or any other information that may be of interest to the customer.

Generally, the Company does not rely on consent as a legal basis for processing Covered Person's personal data other than in relation to sending third party direct marketing communications. Covered Person have the right to withdraw the consent to marketing at any time by contacting the Company at namaste@smfgindia.com.

The Company will only use Covered Person's personal information / data for the purposes for which it was collected, unless the Company reasonably consider that it needs to use it for another reason and that reason is compatible with the original purpose.

The Covered Person can contact the Company if any explanation required in this regard.

5. Transfer of Information

The Company may share the information with individuals and body corporate in the course of normal business operations, such as providing services Covered Person has subscribed for, and any activity related to these services such as collection of fee. It may become necessary for the Company to disclose Covered Person's personal information to its agents and contractors in the course of normal business operations for the above referred purpose. However, these parties would be required to use the information obtained from the Company for such purposes exclusively. The Company would ensure that the third parties receiving any sensitive personal data or information from the Company or from any person on

behalf of the Company also do not disclose it further. The Company would also endeavor that these third parties maintain the same level of data protection that is adhered to by the Company.

The Company will endeavor to take all reasonable steps to ensure that the confidentiality of Covered Person's information is maintained by imposing strict confidentiality standards on all the third parties to whom it discloses such information. The Company would build-in the necessary covenants for the outsourcing arrangements that are material in nature.

The Company would transfer customer's information only if it is necessary for the performance of a lawful contract between the company and the Covered Person as consented by the customer for data transfer.

The Covered Person authorizes the Company to exchange, share, part with all information related to the details and transaction history of the customers to its Affiliates / Subsidiaries / Banks / Financial Institutions / Credit Bureaus / Agencies/Participation in any telecommunication or electronic clearing network as may be required by law, customary practice, credit reporting, statistical analysis, credit scoring, verification or risk management and shall not hold the company liable for use or disclosure of this information.

The Company may collect card payments through a Payment Card Industry Data Security Standard (PCI DSS) compliant partner(s) and the Covered Persons may contact the Company if an email/SMS confirmation was not received within 48 hours for any payment made through a card swipe.

6. Data Security

The Company is strongly committed to protecting the privacy of its Covered Person and has taken all necessary and reasonable measures to protect the confidentiality of the information and its transmission through the world wide web and it shall not be held liable for disclosure of the confidential information when in accordance with this Privacy Commitment or in terms of the agreements, if any, with the Covered Person.

The Company will limit access to Covered person's personal data to the employees, agents, contractors and other third parties who have a business need to know.

The Covered person is responsible for maintaining the security of their Sensitive personal and financial information. The Company will not bear any liability in respect of such unauthorized use.

7. Data Retention

The Company will retain the information / data as long as necessary to fulfil the purposes for which the Covered Person has provided the information / data, including for the purpose of satisfying any legal, accounting or reporting obligations and similar essential purposes. To determine the appropriate retention period, the Company may consider the nature and sensitivity of the personal data and the purpose.

The Covered Person has the right to review the information provided and correct or amend any personal information or sensitive personal and financial information if found inaccurate.

The Company has appointed a Grievance Officer to redress the grievances or provide information in relation to this Privacy Policy expeditiously, but within one month from the date of receipt of such grievance.

Designation: Compliance Officer

Email address: privacy@smfgindia.com

Postal address: Commerzone IT Park, Tower B, 1st Floor, No. 111, Mount Poonamallee Road, Porur, Chennai, Tamil Nadu - 600116.

Consent to collect, use and storage of Aadhaar number for authentication purpose

By sharing the Aadhaar number, you have authorised us to collect, use and store Aadhaar number only for authentication purpose and for providing insurance services in terms of the applicable laws. Aadhaar numbers so collected shall be kept protected in an encrypted form in Aadhaar Vault. It shall not be disclosed unless the same is required to be disclosed under applicable laws.

8. General

- i. Exclusions from Privacy Policy: Other websites that Covered person may access via the Company's website may have different privacy policies and access to such web sites will not be subject to this privacy policy. The Company recommends that Covered person to read the privacy statement of each such website to find out how they protect Covered Person's personal information.
- ii. Amendments: Due to changes in legislation or enhancements to functionality and content on the website, the Company may make changes to its Privacy Policy (without being obliged to do so) and would reflect those changes in this Privacy Policy statement. Hence Covered Person is obliged to go through the Privacy Policy statement on a regular basis.
- iii. Non-Binding: Please note that this Privacy Policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.
- iv. Prohibited Actions: While using the website of the Company, Covered Person agrees not to, by any means (including hacking, cracking or defacing any portion of the Site) indulge in illegal or unauthorized activities including the following:
 - Restrict or inhibit any authorized user from using the website
 - Use the website for unlawful purposes
 - Harvest or collect information about website users without their express consent
 - "Frame" or "mirror" any part of the website without our prior authorization
 - Engage in spamming or flooding
 - Transmit any software or other materials that contain any virus, time bomb, or other harmful or disruptive component
 - Remove any copyright, trademark or other proprietary rights notices contained in the website
 - Use any device, application or process to retrieve, index, "data mine" or in any way reproduce or circumvent the navigational structure or presentation of the website
 - Permit or help anyone without access to the Site to use the website through username and password or otherwise